

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,
STATE OF NEW MEXICO
and
NEW MEXICO ENVIRONMENT
DEPARTMENT,

Plaintiffs,

v.

CHEVRON MINING INC.,
Defendant.

Civil Action No. 1:16-cv-00904-WPL
Hon. WILLIAM P. LYNCH

PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO EXCEED PAGE LIMITS

Plaintiffs United States, State of New Mexico and the New Mexico Environment respectfully move unopposed, pursuant to D.N.M.LR-Civ. 7.2, for leave to file their Memorandum in Support of the United States' Motion to Enter Consent Decree in excess of the page limit set forth in D.N.M.LR-Civ. 7.5. The Memorandum is 39 pages long (plus attachments), addresses all of the relevant factual and legal issues involved in this case, and responds to each of the comments received during the public comment period.

The United States attempted to be as succinct as possible, but was unable to present its arguments relating to all of these issues within the 27-page limit. Therefore, the Plaintiffs respectfully request that the Court grant this motion for leave to file its brief in excess of the page limit. Counsel for Chevron Mining has agreed not to oppose this motion. A proposed approved Order will be emailed to the Court.

Respectfully submitted,

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/s/

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